

Hon. Benjamin H. Settle

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

ANTHONY FLAAEN,  
Plaintiff,  
vs.

Case No. 3:15-cv-05899-BHS

MCLANE COMPANY, INC. dba MCLANE/  
NORTHWEST; MCLANE COMPANY, INC.  
dba MCLANE/NORTHWEST LONG-TERM  
DISABILITY PLAN; and PRINCIPAL LIFE  
INSURANCE COMPANY,

**DECLARATION OF NANCY TAYLOR  
IN SUPPORT OF DEFENDANT  
PRINCIPAL LIFE INSURANCE  
COMPANY'S RESPONSE BRIEF IN  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

Defendants.

**NOTE ON MOTION CALENDAR:  
July 29, 2016**

I, Nancy Taylor, being first duly sworn, depose and state as follows:

1. I hold the position of Senior Claim Account Manager with Principal Life Insurance Company ("Principal Life"). In that position I am familiar with the group long term disability coverage issued to McLane Company, Inc. by Principal Life pursuant to the terms of Group Policy No. H25974. I make this affidavit based upon my own personal knowledge and the business records of Principal Life.

2. A true and correct copy of the group long term disability policy No. H25974, issued to McLane Company, Inc., is attached hereto as Exhibit A. Group Long Term Disability Policy No. H25974 was issued and delivered in the State of Texas on a policy form approved by the Texas Department of Insurance.

3. A true and correct copy of the group long term disability booklet-certificate, issued in connection with Group Policy No. H25974, and provided to the policyholder for distribution to

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DECLARATION OF NANCY TAYLOR IN SUPPORT OF  
DEFENDANT'S RESPONSE TO MOTION FOR PARTIAL  
SUMMARY JUDGMENT  
Case No. 3:15-cv-05899-BHS

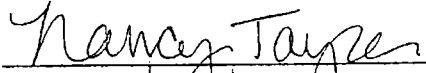
Wilson Elser Moskowitz Edelman & Dicker LLP  
55 West Monroe Street, Suite 3800  
Chicago, Illinois 60603  
Tel.: (312) 821-6162  
Fax: (312) 704-1522

1 its employees, is attached hereto as Exhibit B.

2 4. A true and correct copy of the group application completed by McLane Company,  
3 Inc. in 2006 is attached hereto as Exhibit C.

4  
5 I AFFIRM UNDER PENALTY OF PERJURY AND THE LAWS OF THE STATE OF  
6 WASHINGTON THAT, TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE  
7 FOREGOING STATEMENTS ARE TRUE AND CORRECT.

8 NANCY TAYLOR

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10 Date: 7/25/16